

FEB 08 2008

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

SONOPRESS GmbH,

Plaintiff,

v.

METRO-GOLDWYN-MAYER HOME  
ENTERTAINMENT LLC,

Defendant.

Case No. 07 CIV 3752(LTS)(KNF)

**STIPULATION AND PROPOSED  
REVISED SCHEDULING ORDER**

WHEREAS, Plaintiff Sonopress GmbH ("Sonopress") and Defendant Metro-Goldwyn-Mayer Home Entertainment LLC ("MGM") have noticed eighteen (18) depositions in this case and have been discussing and negotiating both a schedule for those depositions and related document production issues for approximately the past thirty (30) days; and

WHEREAS, six (6) of the currently noticed depositions are of non-party witnesses; and

WHEREAS, all of the noticed deponents reside and work outside of the state of New York, eight (8) of whom are located in Europe and ten (10) of whom are located in California; and

WHEREAS, at least six (6) of the depositions are scheduled to take place in California and one (1) in England; and

WHEREAS, the parties are attempting to arrange a mutually convenient schedule for all the parties, non-parties and counsel involved in this action;

IT IS THEREFORE HEREBY STIPULATED, CONSENTED, AND AGREED, by and between the parties and their undersigned counsel of record that the deadline for

completion of fact discovery, subject to the approval of this Court, shall be and hereby is further extended from March 15, 2008 until April 18, 2008; and

IT IS FURTHER STIPULATED, CONSENTED, AND AGREED, by and between the parties and their undersigned counsel of record that, subject to the approval of this Court, the schedule of depositions of witnesses shall be as follows:

February 19, 2008:	Christopher Yin (New York City)
February 20, 2008:	Martin Dannhoff (New York City)
February 21, 2008:	Craig Ruby (New York City)
March 5, 2008:	Blake Thomas (Los Angeles)
March 6, 2008:	Jeffrey Karbowiak (Los Angeles)
March 6, 2008:	Simon Staines (London)
March 11, 2008:	Heiner Kleinekathöfer (New York City)
March 12, 2008:	Chris Bosco (New York City)
March 13, 2008:	Mark Puskaric (New York City)
April 3, 2008:	Hermann Heemeyer (New York City)
April 8, 2008:	Reinoud Wollenberg (New York City)
April 9, 2008:	Sven Deutschmann (New York City)
April 11, 2008:	Erik Lomis (New York City)
April 16, 2008:	Eric Villette (Los Angeles)
April 18, 2008:	Akin Ceylan (Los Angeles)

In addition, the parties have agreed to schedule before April 18, 2008 the following depositions: (1) the deposition in Los Angeles of non-party Twentieth Century Fox; (2) the deposition in Los Angeles of non-party Sony Corporation; (3) the 30(b)(6) deposition of Sonopress in New York City; (4) the 30(b)(6) deposition of MGM in New

York City; and (5) the deposition of non-party Cinram. The scheduling of these depositions is without prejudice to the right of either party (a) to seek to conduct additional depositions or (b) to object to additional depositions on any ground, including that they would exceed the number allowable as of right.

IT IS FURTHER STIPULATED, CONSENTED, AND AGREED, by and between the parties and their undersigned counsel of record that, subject to the approval of this Court, the following additional deadlines in this case shall be set as follows:

<u>Action Required</u>	<u>Deadline</u>
Completion of Expert Discovery	June 16, 2008
<del>Filing of Dispositive Pre-Trial Motions</del>	<del>July 15, 2008</del> <i>KNF U.S.M.J.</i>
<del>Final Pre-Trial Conference</del>	<del>September 12, 2008</del> <i>KNF U.S.M.J.</i>

All other dates shall be calculated in accordance with the manner set forth in Judge Swain's August 23, 2007 Pre-Trial Scheduling Order.

Dated: New York, New York  
February 7, 2008

ALSTON & BIRD LLP

By: *[Signature]*  
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Karl Geerken (KG 5897)  
Amber Wessels (AW 2322)

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By: *[Signature]*  
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Attorneys for Defendant

*A telephonic pretrial status conference, initiated by counsel to the plaintiff, shall be held on March 31, 2008, at 10:15 a.m. KNF U.S.M.J.*

SONOPRESS GMBH

By: 

Name:

Dr. Marky Daniloff

Title:

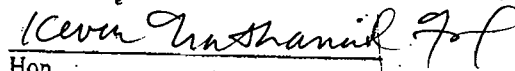
Sonopress Legal Counsel

METRO-GOLDWYN-MAYER  
HOME ENTERTAINMENT LLCBy: 

Name:

PAMELA M. REYNOLDS  
SENIOR VICE PRESIDENT  
BUSINESS & LEGAL AFFAIRS

SO ORDERED: 2/22/08



Hon.

**HON. KEVIN NATHANIEL FOX**  
United States Magistrate Judge  
Southern District of New York